

DOCKET SECTION

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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**POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY**

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
ANSWERS OF WITNESS BALL TO INTERROGATORIES
OF UNITED PARCEL SERVICE (UPS)**

UPS/FGFSA-T2-1-2

February 17, 1998

**Florida Gift Fruit Shippers Association (FGFSA) hereby provides the
Answers of Witness Ball to interrogatories of UPS, UPS/FGFSA-T2-1-2.**

Each interrogatory is stated verbatim, followed by the Answer.



**M. W. Wells, Jr., Attorney for
Florida Gift Fruit Shippers Association**

UPS/FGFSA-T2-1

Refer to page 13 of FGFSA -T-2. Provide all supporting documentation and analysis for your assertion that the Postal Service has selected and contracted for vehicle capacity far in excess of that needed to transport mail.

ANSWER

The TRACS data and the responses of USPS Witness Nieto show the extent that the capacity of the vehicles are underutilized in Intra-BMC and Inter-BMC transportation.

UPS/FGFSA-T2-2

Refer to page 7 of FGFSA-T-2 regarding calculation of the appropriate rate for a parcel based on zip code. Is the Association able, at its choice, to designate any post office within the BMC area as the entry post office for purposes of determining the origin zip code, even though the parcel is dropped at the BMC, or does the Postal Service require that the BMC (or some other facility designated by the Postal Service) be treated as the entry office for purposes of determining the origin zip code for rate purposes? Please explain your answer.

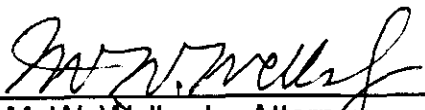
ANSWER

The designated parent post office for each BMC is used as the entry post office for all parcels unloaded at the BMC

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding on this date in accordance with Section 12 of the Rules of Practice and Procedure.

Dated : February 17, 1998



M. W. Wells, Jr., Attorney